

EXHIBIT

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF ARNOLD JOHN ROMA, JR.

I, ARNOLD JOHN ROMA, JR., pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at World Trade Center South Tower when the terrorist attacks of the World Trade Center Towers occurred.

4. On the morning of September 11, 2001 I was working as a volunteer Firefighter with the Richmond Engine Co. No. 1 out of Staten Island. I was dispatched to 2 World Trade Center-South Tower. I also worked as a Registered Nurse. I was previously a New York City Police Officer, retiring in 1993.

5. After arriving at the South Tower, I entered the Marriott Hotel lobby looking for my Battalion Chief. Almost immediately upon entering I heard what sounded like a train engine. I

turned to see a mass of people running towards me trying to escape the hotel lobby. Realizing the building was collapsing, I turned to run but the force of the collapse threw me to the ground. I was terrified believing I was going to die. Lying on the ground, I was disoriented and all I could see was blackness. I began to hear voices and realized there were others, including my fellow firefighters, in the rubble beginning to try to find their way out. We helped each other and others thru the dust and debris, eventually finding an opening in a roll down gate. I personally pulled burning victims from the elevators towards the exits. I was trapped for about thirty minutes under the collapsed building. Once out on the street, as I was being helped to move away from the collapsed building towards the water, the second tower collapsed. I was hit by debris and overcome by smoke and dust. Eventually I made my way to the harbor where I was taken by boat to New Jersey and admitted to St. Francis Hospital.

6. I suffered a torn rotator cuff in my right shoulder, bilateral corneal abrasions as well as cuts and bruises over my body. Today, I suffer irreversible damage to my body and lungs including: reactive airway disease, esophageal reflux, COPD, and asthma from the extreme intense exposure to the smoke, debris and burning chemicals such as aluminum and copper. I was diagnosed with squamous cell carcinoma on my left arm in 2015.

7. One of the most debilitating diseases I have been diagnosed with is Post Traumatic Stress Disorder (PTSD). I witnessed many horrifying scenes such as people being burned alive and jumping to their deaths all round me. I lost my youngest son, Keith, who was killed during the attacks while working as a member of the New York Fire Patrol. After my release from the hospital, I returned every day in search of my son. I pulled his body myself and carried him away from the rubble on Christmas Eve. To this day, I suffer bouts of anger and hopelessness. Loud sudden noises frighten me and give me flashbacks to the day of the attacks. I can no longer be in

a room or building with too many people and only limited exits or confined spaces. I suffer from panic attacks, depression and disrupted sleep pattern. I now only exist I am never happy.

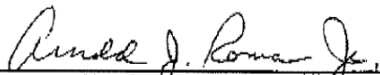
8. I sought medical attention for my injuries, and I continue to receive medical treatment for my related illnesses. Attached as Exhibit B to this Declaration are true and correct copies of my medical records regarding my 9/11 injuries.

9. Due to my permanent disabilities caused by the events of 9/11, I have not been able to return to work as a registered nurse since that time.

10. I suffered, and continue to suffer, severe emotional distress. I receive regular counseling while I continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks.

11. I previously pursued a claim (Claim Number 212-004217) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

Executed on this 11th day of June 2020.


Signature of Declarant (Arnold John Roma, Jr.)

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**